

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	Case No. 08 CR 327
	)	
v.	)	Judge Ruben Castillo
	)	
KAMLESHWAR GUPTA	)	Magistrate Judge Denlow
and KAM ENGINEERING, INC.,	)	
	)	
Defendants.	)	

**AGREED MOTION FOR MODIFICATION OF RELEASE ORDER**

Defendant KAMLESHWAR GUPTA, by and through his undersigned attorneys, hereby moves with the agreement of the Government for an order modifying the Order Setting Conditions of Release to allow travel within the continental United States. In further support of this motion, Defendant states as follows:

1. On April 30, 2008, the Court entered an Order Setting Conditions of Release under which Defendant was released on a \$220,000 bond with surrendering of passport to Pretrial Services, reporting to Pretrial Services as directed, and restricting travel to the Northern District of Illinois and Springfield, Illinois. The Court also granted Defendant's request for leave to travel to Boston from June 3, to June 8, 2008 and to Alaska with his passport from July 26, 2008 through August 5, 2008.

2. Defendant has complied with the conditions of the Release Order to date, traveling to and returned from Boston and to and from Alaska as planned. For the Alaska trip, Pretrial Services temporarily released Defendant's passport, which Defendant promptly returned upon his return. In addition, Defendant has regularly reported to Pretrial Services as directed.

3. Last week, Defendant informed Pretrial Services of his desire to visit Charleston, South Carolina between approximately September 11, 2008 and September 16, 2008, and his desire to take a day trip to Lake Geneva, WI or Wisconsin Dells in the upcoming weeks.

4. On August 13, 2008, I contacted Pretrial Services to discuss Defendant's requested trips and the terms of the Release Order. Pretrial Services suggested that I bring a motion seeking to modify the terms of Release Order in order to allow Defendant to travel throughout the continental United States, in light of Defendant's request and his prompt return from prior trips. Pretrial had no objection to modifying the Release Order in this manner.

5. On August 13, 2008, I contacted Assistant U.S. Attorney Christina Egan, who agreed to a motion that would expand the terms of the Release Order to allow for travel within the continental United States, provided that Pretrial Services is informed of and agrees to any travel outside of the Northern District of Illinois.

6. Pursuant to 18 U.S.C. § 3142(c), Defendant respectfully requests that the Court modify the Order Setting Conditions of Release to allow Defendant to travel within the continental United States, provided that he continues to report to Pretrial Services as directed. Defendant understands that he will need to continue to notify Pretrial Services of any travel outside of the Northern District of Illinois. In accordance with 18 U.S.C. § 3142(c), the requested revision of the Release Order will continue to set conditions that will reasonably assure the appearance of Defendant without the need to seek approval of the Court each time Defendant seeks to take trips outside of the Northern District of Illinois but within the United States.

7. Pretrial Services and Assistant U.S. Attorney Christina Egan agree to this motion, which is brought to facilitate the orderly and efficient resolution of this matter.

WHEREFORE, Defendant GUPTA requests that the Court modify the Order Setting Conditions of Release to allow travel within the continental United States.

Date: August 13, 2008

Respectfully submitted,

KAMLESHWAR GUPTA, Defendant,

By: /s/ Jonathan R. Buck  
Attorney For Defendant,  
Kamleshwar Gupta

Pravin B. Rao (ARDC #06230097)  
Jonathan R. Buck (ARDC #06281672)  
PERKINS COIE LLP  
131 South Dearborn Street  
Suite No. 1700  
Chicago, Illinois 60603-5559  
Tel: (312) 324-8400  
Fax: (312) 324-9400

**CERTIFICATE OF SERVICE**

I, Jonathan R. Buck, certify that on August 13, 2008, I caused a true and complete copy of Defendant, Kamleshwar Gupta's, **NOTICE OF AGREED MOTION** and **AGREED MOTION FOR MODIFICATION OF RELEASE ORDER** to be served via CM/ECF upon:

Christina Egan  
Assistant United States Attorney  
219 South Dearborn Street, 5<sup>th</sup> Floor  
Chicago, Illinois 60604

George Pappas  
Attorney at Law  
Three First National Plaza  
Suite No. 3700  
Chicago, Illinois 60602

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/s/Jonathan R. Buck